

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
Fort Lauderdale Division

DVASH AVIATION HOLDINGS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 0:24-cv-60312-AHS
	)	
AMP LEASING LIMITED, <i>et al.</i>	)	
	)	
Defendants.	)	

**JOINT MOTION FOR EXTENSION OF DEADLINE TO**  
**AMEND PLEADINGS AND JOIN PARTIES**

Come now Dvash Aviation Holdings, LLC (“Dvash” or the “Plaintiff”) and AMP Leasing Limited (“AMP” or the “Defendant”) (collectively, the “Parties”), by and through respective undersigned counsel, who move pursuant to pursuant to Fed. R. Civ. P. 6(b)(1) (the “Joint Motion”) for a forty-five (45) day extension of the deadline to amend pleadings and join parties, as required by the Order Setting Trial and Pre-Trial Schedule, Requiring Mediation, and Referring Certain Matters to Magistrate Judge [DE 27] (the “Scheduling Order”). For the reasons set forth below, the Parties jointly request that the Court grant the Joint Motion.

1. On July 31, 2024, the Court issued the Scheduling Order which established various deadlines in the case.
2. The parties exchanged initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and are in the process of providing additional information.
3. Counsel for the Parties would like to have the opportunity to review this additional information and potentially depose one or more witnesses prior to the deadline to amend pleadings and join parties.

4. It is for this reason that the Parties jointly request a forty-five (45) day extension of this deadline.

5. This request is being made prior to the expiration of the initial deadline and the Parties submit that good cause exists for the granting of this extension of time.

6. No prior request has been made for the relief requested in this Joint Motion.

WHEREFORE, for the reasons set forth above, the Parties respectfully request that the Court grant the Joint Motion and extend the time until October 29, 2024 for the parties to amend pleadings and join parties, together with such other and further relief as to this Court appears just and proper.

Respectfully Submitted,

THE VERSTANDIG LAW FIRM, LLC

/s/ Maurice B. VerStandig (signed w/ express permission)

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*Counsel for AMP Leasing Ltd.*

**Certificate of Service**

I hereby certify that on September 13, 2024 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served a copy of the foregoing upon the following:

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